



Wm. Bolthouse Farms, Inc.
7200 East Brundage Lane • Bakersfield, CA 93307-3016
661/366-7205

Katherine Benham
National Organic Standards Board
Room 4008 – South Building 1400 and Independence Ave.
SW; Washington, D.C. 20250-0001

April 6, 2006

Dear Katherine Benham,

I am writing to express our full support for the Handling Committees Final Recommendation (5-0) in favor of the continued allowance of chlorine materials.

§205.605(b) Synthetics allowed:

Chlorine materials – disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite).

Chlorine materials have been used for decades to insure water and food safety. Here at Bolthouse Farms, we use Chlorine Dioxide as a disinfectant/sanitizer in our carrot process facilities as an antimicrobial agent to control harmful microorganisms in the process water with known results on efficacy. We are very concerned about the potential outbreak of plant and food borne pathogens. Our concern is if Chlorine materials are not continued to be organic “synthetic allowed” for use as a disinfectant/sanitizer that we will not be able to adequately control contamination from food borne pathogens. We have used ozone as a disinfectant but had problems with off gassing and maintaining levels to effectively kill pathogens. Chlorine materials are the only organic “synthetic allowed” products available we have found that produce results with surety of controlling food borne pathogens.

If Chlorine materials are not continued to be allowed as disinfectants/sanitizers for organic use the potential for human illness associated with organic food could be devastating for the organic industry.

I would like to encourage the National Organic Standards Board to approve the continued use of Chlorine materials as unanimously recommended by the Handling Committee.

Respectfully submitted,

Malcolm Ricci
Organic Operation Coordinator
Bolthouse Farms, Inc.
(661) 366-7209 ext.1528